

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

In re:	*						
NANCEE W. BLACK	*	Case No. 17-14256-DER					
	*	Chapter 13					
Debtor	*						
* * *	*			*	*		*
THE BANK OF NEW YORK MELLON	*						
fka THE BANK OF NEW YORK as							
successor in interest to JPMORGAN	*						
CHASE BANK, NA as Trustee for							
STRUCTURED ASSET MORTGAGE	*						
INVESTMENTS II TRUST 2006-AR3							
MORTGAGE PASS-THROUGH	*						
CERTIFICATES SERIES 2006-AR3							
and its assignees and/or	*						
successors in interest,							
Movant/Secured Creditor	*						
v.							
NANCEE W. BLACK	*						
Debtor							
Respondents	*						

LIMITED OBJECTION BY CHAPTER 13 TRUSTEE TO THE MOTION FOR ORDER
GRANTING RELIEF FROM AUTOMATIC STAY FILED BY
THE BANK OF NEW YORK MELLON

Robert S. Thomas, II, Trustee, files this Limited Objection to the Motion for Order Granting Relief from Automatic Stay filed by The Bank of New York Mellon in this case and, for cause, states:

1. The Chapter 13 Trustee needs to investigate and determine what, if any, equity exists in the Debtor's real estate. There is or may be potential equity to effectuate a successful reorganization.

2. The Chapter 13 Trustee needs to investigate the insurance proceeds and the insurance coverage on the residence.

3. The Chapter 13 Trustee needs to review the loan documents.

4. For the reasons stated, the Chapter 13 Trustee objects to the Bank's Motion for Order Granting Relief from Automatic Stay.

WHEREFORE, the Trustee requests this Court to deny the Motion for Order Granting Relief from Automatic Stay filed by The Bank of New York Mellon, and to grant such other relief as is just.

Respectfully Submitted,

Date: September 1, 2017

/s/ Robert S. Thomas, II

Robert S. Thomas, II, Trustee
300 E. Joppa Road, Suite #409
Towson, MD 21286
(410) 825-5923
inquiries@ch13balt.com

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of September, 2017, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the Chapter 13 Trustee's Limited Objection to Motion for Order Granting Relief from Automatic Stay will be served electronically by the Court's CM/ECF system on the following:

Diana Carolina Valle ecf@logs.com
Kristine D Brown ecf@logs.com

I hereby certify that on the 1st day of September, 2017, a copy of the Chapter 13 Trustee's Objection to Motion for Order Granting Relief from Automatic Stay was also mailed first class mail, postage prepaid to:

NANCEE W. BLACK
PO BOX 23
GIBSON ISLAND, MD 21056

/s/ Robert S. Thomas, II

Robert S. Thomas, II, Trustee